

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of

Request for Comments on _____)
Hearing Aid Compatibility Report by the _____) WT Docket No. 06-203
Wireless Telecommunications Bureau)

Comments

The Northern Virginia Resource Center for Deaf and Hard of Hearing Persons (NVRC) is a nonprofit organization, established in 1987, that primarily serves the Virginia counties of Fairfax, Arlington and Loudoun and Prince William and the cities of Alexandria, Fairfax, Falls Church, Manassas, and Manassas Park. NVRC's service area contains an estimated 180,500 deaf and hard of hearing people. The mission of NVRC is to empower deaf and hard of hearing individuals and their families through education, advocacy and community involvement.

NVRC submits these comments in response to the Commission's invitation to Comment from the Wireless Telecommunications Bureau (Bureau) on three topics addressed in their staff report:

- 1) whether to increase [or] decrease the 2008 requirement to provide 50 percent of phone models that comply with a U3 rating;
 - 2) whether to adopt HAC implementation benchmarks beyond 2008; and
 - 3) whether to otherwise modify the HAC requirements.
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- 1) NVRC believes the 2008 requirement to provide 50 percent of phone models that comply with a U3 rating should be increased. Compared to the requirement for virtually 100% of wireline phones to be HAC, the wireless requirement is for only five digital wireless handset models for each air interface that meets the Commission's radio frequency interference standard, phasing in to 50% by February 18, 2008.

There are 224 million cell phone subscribers in the US today. Cell phones are used by individuals in their home and at work, for

emergency situations and for casual conversations, to keep each other connected. People who are deaf, late-deafened and hard of hearing have reached an all-time high of approximately 31 million, and the number is estimated to reach 40 million at the end of the decade. To exclude those people who use cell phones with their hearing aids is potentially excluding a large segment of the population from access to a basic and universally accepted communication tool.

NVRC urges the Commission to retain the 50% benchmark. A goal of 100% should be reached by a phased in process over time.

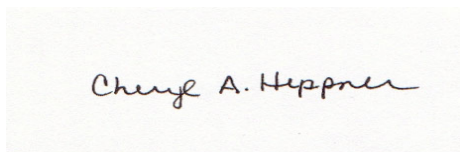
- 2) NVRC urges the Commission to increase the requirements for handsets that are capable of inductive coupling. For inductive coupling, two handset models for each air interface were required by September 18, 2006. There is no requirement for increasing the numbers of handsets capable of inductive coupling beyond those two.

The demand for T3/4 phones will increase, not lessen, over time. The use of telecoils nationwide is now more than 50% compared to 33% in 1998. In addition, cochlear implants that originally had no telecoil option now are available with that option. With increased awareness of the benefits of telecoils, not only for phones but for assistive listening devices, we anticipate an increased use of telecoil technology.

NVRC urges the Commission to adopt benchmark requirements for inductive coupling capable handsets to phase in over a period of time to ultimately reach 100%.

NVRC thanks the Commission for this opportunity to comment on this important matter.

Respectfully submitted,

A handwritten signature in cursive script that reads "Cheryl A. Heppner". The signature is written in dark ink on a light-colored, slightly textured background.

Cheryl Heppner
Executive Director, NVRC
December 15, 2006